



Inter-Community Telephone Co.

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FCC Mail Room

P.O Box 8 Nome, ND 58062

800-350-9137

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

February 4th, 2016

Attn: Wireline Competition Bureau

DOCKET FILE COPY ORIGINAL

Re: Connect America Fund, WC Docket 10-90

Dear Ms. Dortch:

I am writing on behalf of Inter-Community Telephone Company, LLC, Dakota Central Telecommunications Cooperative, Moore & Liberty Telephone Company and Polar Communications Mutual Aid Corporation to support and underscore the importance and urgency of the letter from Dickey Rural Telephone Cooperative ("Dickey") to the Federal Communications Commission (the "FCC") dated January 25, 2016. We are the four North Dakota Rural Local Exchange Carriers ("RLECs") which are impacted by Dickey's previous filing which is the subject of that letter, and our customers would be the deserving beneficiaries of the FCC's prompt implementation of the corrections now sought by Dickey.

In its January 25 letter, Dickey noted that its "previously filed FCC Form 477 containing data as of December 31, 2014 had incorrectly identified numerous census blocks outside of its study area as having broadband service deployed by (Dickey's) 700 MHz wireless service." The effect of these inadvertent errors was to indicate that broadband is much more widely available in these areas than is in fact the case. Dickey subsequently recognized the errors when reviewing later A-CAM proposals, and then "immediately took action and submitted revised data on December 4th, 2015." The purpose of Dickey's letter was to request "that the FCC allow these corrections to be included in the A-CAM as soon as possible...." The reason for this urgent request is that, as Dickey correctly pointed out, "without these corrections, the FCC's universal service policy for the North Dakota ILECs' study areas will be challenged as the amount of support available will not be sufficient to advance broadband technology in the area."

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As the RLECs serving our extensive but sparsely-populated service territories, we are dedicated to providing our customers the best possible service. This specifically includes our commitment to offer the highest-capacity broadband services that are financially feasible for us to deploy. In order for us to receive the necessary and appropriate support to provide improved broadband capacities to our rural customers, Dickey's corrections must be included in the final A-CAM program. We thus request that the FCC assure that Dickey's corrected Form 477 is used in developing the final A-CAM program. Failure to do so would substantially and improperly damage our ability to provide the broadband capacities and services which our customers need, and which the FCC has made clear it wishes us to make available.

Please give me a call with any questions or comments you may have relating to this matter, and thank you for your attention.

A handwritten signature in black ink, appearing to read "Mark Johnson".

Mark Johnson, Chief Executive Officer

Cc: Dakota Central Telecommunications Cooperative
Moore & Liberty Telephone Company
Polar Communications Mutual Aid Corporation